

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

Exhibit "C"

RECEIVED

JUN 13 2019

LATTI & ANDERSON LLP

NATIONAL LIABILITY & FIRE INSURANCE CO.

and

BOAT OWNERS ASSOCIATION OF THE  
UNITED STATES

Plaintiffs,

v.

NATHAN CARMAN

Defendant.

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: Civil Action No: 17-38-WES-PAS  
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: In Admiralty  
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**PLAINTIFFS' TENTH SUPPLEMENTAL DISCLOSURES**

Plaintiffs/counterclaim defendants NATIONAL LIABILITY & FIRE INSURANCE COMPANY ("NLFIC") and BOAT OWNERS ASSOCIATION OF THE UNITED STATES ("BoatU.S."), by and through their attorneys supplement their Fed. R. Civ. P. 26 document disclosures:

Further to our September 10, 2018 disclosure of Attorney Calio, her meetings with Nathan Carman and his grandfather also included what Nathan would receive by way of inheritance from his mother. Attorney Calio is in possession of two documents which are property of his mother's estate, and on information and belief Nathan Carman has copies of both, but the two documents are arguably currently subject to the NH protective order in the dismissed *Santilli* case. Undersigned counsel has not viewed either document but it is anticipated that both will be released from the NH protective order in time for use at trial. Undersigned counsel is advised that the first document was typed by Nathan Carman listing a series of questions on what

he would receive by way of inheritance following his grandfather's and his mother's deaths. Undersigned counsel is advised that the second document is an agreement between his mother and grandfather in which she agreed not to disinherit Nathan Carman as to her 1/4 share of the Chakalos Family Dynasty Trust which would then become his on her death.

Plaintiffs also disclose the transcripts, video tapes, and exhibits of Nathan Carman's August 27 and 28, 2018 deposition in the NH *Santilli* case.

Plaintiffs also disclose

Chris Campanale  
Campanale & Sons Inc.  
6 Jennifer Court  
Narragansett, RI 02882

Chris Campanale is believed to have information concerning the F/V PRUDENCE's location during the week of September 18, 2016.

Captain and Crewmembers  
F/V PRUDENCE  
Campanale & Sons Inc.  
6 Jennifer Court  
Narragansett, RI 02882

Captain and Crewmembers of F/V PRUDENCE to be determined who were onboard the vessel on or about the week of September 18, 2016.

Dated: June 11, 2019

PLAINTIFFS



David J. Farrell, Jr.

*Pro Hac Vice*

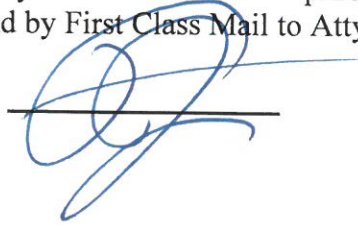
Liam T. O'Connell

*Pro Hac Vice*

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*Certificate of Service*

I served this tenth supplemental disclosure  
by email on Attys Anderson and Humphrey  
06/11/2019 and by First Class Mail to Atty Anderson.

A handwritten signature in blue ink is written over a solid horizontal black line. The signature is stylized and cursive, appearing to be the initials 'JH' followed by a flourish.